

UNITED STATES BANKRUPTCY COURT  
MIDDLE DISTRICT OF FLORIDA  
ORLANDO DIVISION

In re:

Case No.: 6:15-bk-01838-KSJ  
Chapter 7

JODELL M. ALTIER,

Debtor.

\_\_\_\_\_ /

**OBJECTION TO EXEMPTIONS WITH INCORPORATED MEMORANDUM OF LAW**

**NOTICE OF OPPORTUNITY TO OBJECT AND FOR HEARING**

Pursuant to Local Rule 2002-4, the Court will consider this motion, objection, or other matter without further notice or hearing unless a party in interest files an objection within twenty-one (21) days from the date set forth on the proof of service attached to this paper plus an additional three days for service. If you object to the relief requested in this paper, you must file your response with the Clerk of the Court at George C. Young Federal Courthouse, 400 West Washington Street, Suite 5100, Orlando, FL 32801 and serve a copy on the Trustee's attorney, Michael A. Nardella, Esq., Nardella & Nardella, PLLC, 250 E. Colonial Dr., Ste 102, Orlando, FL 32801, and a copy on the U.S. Trustee, George C. Young Federal Courthouse, 400 West Washington Street, Suite 1100, Orlando, FL 32801, within the time allowed.

If you file and serve a response within the time permitted, the Court may schedule and notify you of a hearing, or the Court may consider the response and may grant or deny the relief requested without a hearing. If you do not file a response within the time permitted, the Court will consider that you do not oppose the relief requested in the paper, will proceed to consider the paper without further notice or hearing, and may grant the relief requested.

Gene T. Chambers, Trustee in Bankruptcy for Jodell M. Altier ("Trustee"), by and through her undersigned counsel, and pursuant to Rule 4003(b), F.R.B.P., hereby objects to the claims of exemptions by the Debtor Jodell M. Altier ("Debtor"), and in support, states as follows:

**FACTUAL BACKGROUND**

1. This bankruptcy was commenced by the filing of a voluntary chapter 7 bankruptcy petition for Debtor on March 4, 2015, in Case Number 6:15-bk-01838-KSJ (the "Petition Date").

**A. The Original Schedules**

2. On March 18, 2015, the Debtor filed her original Schedules and Statement of Financial Affairs (Doc. 9) (the “Original Schedules”).

3. The Original Schedules list no real property.

4. The Original Schedules list no exempt property.

5. The Original Schedules list no ownership interests in any corporate entities of any kind.

**B. Discovery of Undisclosed Assets and Transfers**

6. During the Trustee’s investigations, however, the Trustee learned the Debtor transferred, or purportedly transferred, four separate real properties to a Texas Joint Stock Company called Grande Legacy Group (the “Company”).

7. The four real properties which Debtor transferred are as follows:

a. 2507 Roat Drive, Orlando, FL (the “Roat Drive Property”);

b. 216 NE 10<sup>th</sup> Avenue, Gainesville, FL (the “Gainesville Property”);

c. 2122 Kettle Drive, Orlando, FL (the “Kettle Drive Property”); and

d. 280 Lanternback Island Drive, Satellite Beach, FL (the “Lanternback Property,” and together with the Roat Drive Property, the Gainesville Property, and the Kettle Drive Property, the “Properties”).

8. While the Debtor did disclose the transfer of the Roat Drive Property and the Gainesville Property on the original Statement of Financial Affairs, no disclosure was made at all of the Kettle Drive Property and the Lanternback Property.

9. Fittingly, the undisclosed Kettle Drive Property and the Lanternback Property were completely unencumbered, while the disclosed properties were subject to mortgages.

10. In addition, the Trustee learned that Debtor claims ownership of the Company, the purported owner of all four Properties, although no such ownership interest was disclosed on the Original Schedules.

11. In relation to these and other failures to disclose, creditor Goshen Mortgage, LLC (“Goshen”) filed an action under 11 U.S.C. § 727 to deny Debtor a discharge.

12. During a deposition of Debtor by Goshen, Debtor explained that she transferred the Properties for “asset protection” purposes. *See* Transcript of the Deposition of Jodell M. Altier taken November 5, 2015 (the “Deposition Transcript”) (11:1-4). A copy of the Deposition Transcript is attached hereto as **Exhibit A**.

13. Debtor further admitted that the “asset protection” was a purposeful design to prevent specific, identified creditors from reaching the Debtor’s property if such creditors “came after me.” (Deposition Transcript at 15:4-9).

14. Debtor admitted that when she prepared her schedules she knew about her purported ownership of the Company, but did not list it “Because I didn’t think it had a value” (Deposition Transcript at 26:5-7) even though Debtor had recently transferred the Properties into the Company, two of which were completely unencumbered.

15. In fact, the Debtor produced a stock certificate which is a “bearer shares” certificate such that any party holding the physical certificate is the sole owner of all 1,000 shares of the Company. A copy of the certificate is attached hereto as **Exhibit B**.

16. At the hearing before this Court on February 1, 2016, the Debtor clarified for the Court that her prior ownership interest in the Roat Drive Property and the other Properties had been replaced, exchanged in fact, with an ownership interest in the Company, stating that

I have stock. . . . I don't have property. . . . So I can't have it both ways.

See Transcript of Hearing on Motion for Relief from Stay on February 1, 2016 (the "Hearing Transcript") (10:24-11:6). A copy of the Hearing Transcript is attached hereto as **Exhibit C**.

17. On January 21, 2016, the Trustee filed a Complaint against the Debtor, *et al*, for the recovery of three of the Properties as fraudulent transfers and for declaratory relief establishing the Trustee as the sole owner of the Properties.

**C. The Amended Schedules**

18. In response to the Trustee's and Goshen's actions, on March 23, 2016, the Debtor filed her Amended Schedules (Doc. 83) (the "Amended Schedules") and her Amended Statement of Financial Affairs (Doc. 84) (the "Amended SOFAs").

19. The Amended Schedules are very different from the Original Schedules. The Amended Schedules list six pieces of real property on Schedule A, including the Properties at issue.

20. Inexplicably, the Amended Schedules list the Debtor's ownership interest in the Properties as some sort of "Beneficial Interest" but also confirming that the Properties are still owned by the Company.

21. The Amended Schedules also now show an ownership interest in the Company, but now limit that ownership to 50% of the 1,000 shares.

22. Most problematic, the Debtor's Amended Schedules include a totally revamped Schedule C, which now includes multiple articles of property listed as exempt over one year after the filing of the Original Schedules.

23. Some of this newly minted exempt property includes two vehicles and a boat which Debtor already purchased back from the Trustee (Docs. 47 & 59).

24. The Debtor has also now listed the Roat Drive Property as exempt as her homestead, even though the Roat Drive Property is also still listed as owned by the Company. To solve this apparent paradox, the Debtor further clarifies that it is her “beneficial interest” in the Roat Drive Property that is exempt as homestead.

### **MEMORANDUM OF LAW**

#### **A. Homestead Must Be Owned by a “Natural Person”**

25. The Florida Constitution protects Florida homes from creditors' claims in Article X, Section 4(a)(1) of the Florida Constitution, which provides:

(a) There shall be exempt from forced sale under process of any court, and no judgment, decree or execution shall be a lien thereon, except for the payment of taxes and assessments thereon, obligations contracted for house, field or other labor performed on the realty, the following property owned by a **natural person**:

(1) a homestead . . .

Fla. Const. Art. X, § 4 (emphasis added).

26. The Debtor asserts that she owns a “beneficial interest” in the Roat Drive Property but that the Roat Drive Property is actually owned by the Company, which is a “Texas Joint Stock Company.”

27. Texas courts have defined “a joint stock company as a ‘partnership whereof the capital is divided or agreed to be divided into shares so as to be transferable without the express consent of the copartners.’” *Thompson v. Schmitt*, 115 Tex. 53, 64 (Tex. 1925). “[A] member of a voluntary, unincorporated stock association is ‘a co-partner in a partnership in the shape of a joint-stock company.’” *Id.*

28. The Texas Supreme Court has expressly held that Texas Joint Stock Companies are not trusts and the ownership in such a company is not a “beneficial interest” because “the certificate holders, by contract, have combined their capital to carry on a joint mercantile business as principals, and thereby secured rights not to be disregarded by their agents.” *Id.* at 67-68. In other words, the assets of a Texas Joint Stock Company are ultimately controlled by the principals, not by independent trustees, thus they are not trusts, but partnerships.

29. Florida law is clear that property held by a partnership cannot be homestead. “Property acquired by a partnership is property of the partnership, not the individual partners. . . . Thus, partnership property cannot constitute the homestead property of one partner prior to the dissolution of the partnership.” *Buchman v. Canard*, 926 So. 2d 390, 392 (Fla. 3d DCA 2005).

30. As the Company is treated under Texas law as a partnership, no property owned by the Company can be homestead. By the terms of the Debtor’s own Amended Schedules, the Roat Drive Property is owned by the Company and therefore cannot be Debtor’s homestead.

**B. The Debtor Has Taken Actions Inconsistent with Her Claim of Homestead**

31. “A homeowner . . . can forfeit the right to claim a home exempt.” *In re Franzese*, 383 B.R. 197, 203 (Bankr. M.D. Fla. 2008).

32. An owner of property does “not have the intention needed to establish a homestead where he execute[s] a deed of conveyance of property” to another. *Id.* (citing *Semple v. Semple*, 82 Fla. 138, 89 So. 638, 640 (1921). “[A] homeowner can waive the right to claim homestead protection by abandonment or alienation in any manner provided by law.” *Franzese*, 383 B.R. at 203 (citing *Barlow v. Barlow*, 156 Fla. 458, 23 So.2d 723, 724 (1945)).

33. An owner of property cannot both intend to alienate property to another and at the same time intend to hold the property as his homestead. *See Semple v. Semple*, 89 So. 638, 640

(Fla. 1921) (“The intention to hold the place as his homestead, and the intention to give it to his wife, could not exist at the same time, and where the latter intention culminated in the specific act of executing a deed of conveyance to his wife, all inferences or presumptions of a different intention drawn from other facts and circumstances necessarily fail.”).

34. In the Trustee’s Complaint, the Trustee argues that the deed of the Roat Drive Property executed by Debtor to the Company fails as a matter of law. Therefore, according to the Trustee’s argument in the Complaint, the Company never actually took title to the Roat Drive Property, which has been and remains with the Debtor.

35. There is no dispute, however, that the subjective intent and belief of the Debtor is that she transferred the Roat Drive Property to the Company and the Debtor has reiterated this subjective, albeit incorrect, belief in her Amended Schedules.

36. Black letter law in Florida is that the Debtor’s subjective intent controls questions of homestead. Like the situation in *Semple*, the Debtor in the instant matter has expressed a clear and unambiguous intent to transfer the Roat Drive Property to the Company, *i.e.*, to a partnership entity. An intention to retain the Roat Drive Property as homestead cannot exist at the same time as an intent to transfer property to a partnership, and as the transfer to the partnership, or the attempted transfer of the property to a partnership, “culminated in the specific act of executing a deed of conveyance . . . all inferences or presumptions of a different intention drawn from other facts and circumstances necessarily fail.” *Id.*

37. The Debtor admitted that she attempted to transfer the Roat Drive Property to the Company to avoid a specific, identified creditor. Her position from the beginning of the case, and her current position, is that the Company owns the Roat Drive Property. This subjective

belief of the Debtor, past and present, disqualifies the Roat Drive Property from homestead status.

**C. The Amended Schedules Were Filed in Bad Faith and Will Prejudice the Trustee**

38. There is no doubt that the Amended Schedules were filed in bad faith and will prejudice the Trustee and other creditors.

39. To the extent that *Matter of Doan*, 672 F.2d 831 (11th Cir.1982) is still good law, the exemptions claimed in Amended Schedule C should be denied. Compare *In re Bodensiek*, 522 B.R. 737, 740 (Bankr. S.D. Fla. 2015) (implying that *Doan* remains the law of the 11<sup>th</sup> Circuit until overruled) with *In re Rivera-Cintron*, 2015 WL 4749217, at \*4 (Bankr. M.D. Fla. 2015) (implying that *Doan* was overruled).

40. Assuming that *Doan* is good law, all claimed exemptions on Amended Schedule C should be denied.

41. Assuming that *Doan* is no longer good law, then, as the Supreme Court stated in *Law v. Siegel*, if a court cannot deny certain exemptions, it can certainly fashion appropriate sanctions to remedy bad-faith activity. 134 S. Ct. 1188, 1198 (2014) (“Our decision today does not denude bankruptcy courts of the essential authority to respond to debtor misconduct with meaningful sanctions. . . . Federal Rule of Bankruptcy Procedure 9011—bankruptcy’s analogue to Civil Rule 11—authorizes the court to impose sanctions for bad-faith litigation conduct, which may include “an order directing payment ... of some or all of the reasonable attorneys’ fees and other expenses incurred as a direct result of the violation . . . [and t]he court may also possess further sanctioning authority under either § 105(a) or its inherent powers.”).



42. If this Court rules that the Debtor is entitled to claim the exemptions listed in the Amended Schedules, the Trustee requests the Court reserve the Trustee's right to seek other remedies under the Bankruptcy Code as a consequence of Debtor's bad faith conduct.

**D. The Debtor Is Equitably Estopped from Amending Her Claims of Exemptions**

43. "It is of course true that when a debtor claims a state-created exemption, the exemption's scope is determined by state law, which may provide that certain types of debtor misconduct warrant denial of the exemption." *Law*, 134 S.Ct. at 1196-97. *See also In re Lua*, 529 B.R. 766, 775-76 (Bankr. C. D. Cal. 2015) (holding that debtor was estopped under California law from amending schedule C to claim a homestead exemption as *Law v. Siegel* does not apply to state law justifications for barring exemptions).

44. Florida law also provides that estoppel and waiver can be defenses to a claim of homestead. *See Cavanaugh v. Cavanaugh*, 542 So. 2d 1345, 1353 (Fla. 1st DCA 1989) (remanding homestead issue to trial court to determine whether claimant estopped from asserting homestead exemption).

45. "The viability of these defenses [including estoppel and waiver] depends, obviously, upon the weighing and considering of all facts and circumstances surrounding the controversy between the parties." *Id.*

46. In addition, while *Law* appears to hold that bankruptcy courts cannot invent new justifications for denying exemptions out of 11 U.S.C. § 105, it does not hold that deep-rooted doctrines like equitable estoppel cannot justify the denial of an exemption. To read *Law* for that would do more than deny a bankruptcy judge the right to create common law, but would threaten the separation of powers whereby a court is permitted to control the conduct in its own courtroom.

47. In the state court foreclosure proceeding of the Roat Drive Property, Case No. 2013-CA-12147, before the Circuit Court of the Ninth Judicial Circuit in and for Orange County, Florida (the “State Court Foreclosure”), the Debtor, and Debtor’s agent Darrin C. Lavine (“Lavine”) have taken legal positions stating that the Company, not her personally, is the owner of the Roat Drive Property. On November 6, 2015, the Company and Lavine filed an Amended Motion to Intervene/Motion to Add Indispensable Party Defendant in the State Court Foreclosure (the “Motion to Intervene”). A copy of the Motion to Intervene is attached hereto as **Exhibit D**.

48. The Motion to Intervene states that the Company “bought” the Roat Drive Property and is the “owner” of the Roat Drive Property. The Motion to Intervene is being used as a tool by the Debtor to further delay the State Court Foreclosure.

49. Now that is more convenient for the Debtor to own the property personally, she seeks to amend her claim of exemptions to claim the Roat Drive Property as owned by her and her homestead.

50. Under both Florida law and federal principles of estoppel, the Debtor is prevented from claiming the Roat Drive Property as homestead.

**E. The Amended Schedule C Is Partially Barred by *Res Judicata* and Is Moot**

51. “[T]here is a difference between exercising the right to amend exemptions under Rule 1009 and actually being entitled to the exemption claimed in the amendment. *In re Adams*, 2014 WL 409043, at \*2 (Bankr. M.D. Fla. 2014). “The procedural right to amend is subordinate to [a] substantive *res judicata* effect . . . .” *Id.*

52. Pursuant to Local Rule 6004-1, the Trustee sold two vehicles and a boat back to the Debtor (Docs. 47 & 59). That sale is *res judicata*. The Amended Schedules purport to claim

an exemption in that property, but to the extent the Debtor seeks in any way to affect the consummated sale of the property, the exemptions should be denied.

53. In addition, as the property has been sold, any attempt to claim exemptions of that property is now moot as the property has left the estate.

WHEREFORE, the Trustee respectfully requests that this Court enter an order denying all exemptions listed by the Debtor on her Amended Schedules, reserving an opportunity for the Trustee to seek sanctions to the extent such exemptions are upheld, and granting such other and further relief as the Court deems just and proper.

Respectfully submitted this 6th of April, 2016.

/s/ Michael A. Nardella  
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**Counsel for Gene T. Chambers, in  
her capacity as chapter 7 Trustee  
for the Estate of Jodell Altier**

#### **CERTIFICATE OF SERVICE**

The undersigned hereby certifies that a true and correct copy of the foregoing was furnished via electronic mail using the Court's CM/ECF system and/or via First Class U.S. Mail on the 6th day of April 2016 to: Debtor: Jodell M. Altier, 2507 Roat Drive, Orlando, FL 32835; Debtor's Counsel: Jonathan B. Alper, Esquire, Jonathan B. Alper PLC 274 Kipling Court, Heathrow, FL 32746; Office of the U.S. Trustee, George C. Young Federal Building, 400 W. Washington Street, Suite 1100, Orlando, FL 32801-2210.

/s/ Michael A. Nardella  
Michael A. Nardella, Esq.

## **EXHIBIT “A”**

UNITED STATES BANKRUPTCY COURT  
MIDDLE DISTRICT OF FLORIDA  
ORLANDO DIVISION

CASE NO.: 6:15-BK-01838-KSJ

IN RE:

JODELL M. ALTIER  
DEBTOR.

RULE 2004 EXAMINATION

DEPOSITION OF: JODELL M. ALTIER  
TAKEN ON: NOVEMBER 6, 2015  
TIME: 9:00 A.M. - 9:50 A.M.  
LOCATION: LATHAM, SHUKER, EDEN & BEAUDINE  
111 NORTH MAGNOLIA AVENUE  
SUITE 1400  
ORLANDO, FL 32801  
REPORTER: SANDRA A. MOSER, RPR, FPR  
AND NOTARY PUBLIC

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A P P E A R A N C E S

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ORLANDO, FL 32835  
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P R O C E E D I N G S

THE REPORTER: WOULD YOU PLEASE RAISE YOUR  
RIGHT HAND AND BE SWORN? DO YOU SOLEMNLY SWEAR  
THAT THE TESTIMONY YOU'RE ABOUT TO GIVE WILL BE  
THE TRUTH, SO HELP YOU GOD?

THE WITNESS: YES.

THE REPORTER: THANK YOU.

JODELL ALTIER,

HAVING BEEN DULY SWORN, WAS EXAMINED AND TESTIFIED AS  
FOLLOWS:

DIRECT EXAMINATION

BY MR. LUNA:

Q CAN YOU STATE YOUR FULL NAME?

A JODELL MARIE ALTIER.

Q HOW DO YOU SPELL THE —

A JODELL IS J O D E L L MARIE ALTIER A L T I E

R.

Q WHAT IS YOUR CURRENT ADDRESS?

A 2507 ROAT DRIVE, ORLANDO, 32835.

Q HOW LONG HAVE YOU LIVED AT THAT ADDRESS?

A SINCE 1998.

Q OKAY. ARE YOU THE CURRENT OWNER OF THAT  
RESIDENCE?

A NO.

Q DO YOU KNOW WHO IS THE OWNER OF THAT

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1 RESIDENCE?  
 2 A A TRUST COMPANY.  
 3 Q DO YOU KNOW ITS NAME, BY CHANCE?  
 4 A LET ME THINK OFF THE TOP OF MY HEAD. I  
 5 DON'T, OFF THE TOP OF MY HEAD.  
 6 Q HAVE YOU HAD YOUR DEPOSITION TAKEN BEFORE?  
 7 A A LONG TIME AGO.  
 8 Q WHAT TYPE OF CASE WAS THAT?  
 9 A IT WAS FOR THE COMPANY, ALTIER MECHANICAL  
 10 SERVICES.  
 11 Q WAS IT A BUSINESS DISPUTE?  
 12 A IT WAS A BUSINESS -- A LEASE DISPUTE.  
 13 Q I'LL GO OVER JUST SOME GROUND RULES THAT YOU  
 14 PROBABLY CAN REMEMBER, BUT JUST IN CASE. I WILL ASK  
 15 THE QUESTION. IF YOU COULD ANSWER CLEARLY. TRY TO  
 16 REFRAIN FROM NON-VERBALS LIKE "UMS," NODDING OF THE  
 17 HEAD. IT'S HARD TO GET THAT ON THE COURT REPORTER'S  
 18 TRANSCRIPT TO TRY TO KEEP A CLEAR RECORD. IF YOU NEED  
 19 TO TAKE A BREAK, LET ME KNOW. WE'LL FIND A GOOD  
 20 STOPPING POINT TO TAKE A BREAK. I DON'T ANTICIPATE  
 21 THIS TO TAKE TREMENDOUSLY LONG.  
 22 I'LL ASK THE QUESTION. I EXPECT THAT YOU'LL  
 23 UNDERSTAND THE QUESTION. IF YOU DON'T, PLEASE LET ME  
 24 KNOW. I'LL TRY TO CLARIFY IT TO THE BEST OF MY  
 25 ABILITY.

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1 DO YOU HAVE ANY QUESTIONS ABOUT THE  
 2 PROCEDURE BEFORE WE BEGIN?  
 3 A NO.  
 4 Q OKAY. ALL RIGHT.  
 5 (THE REFERRED TO DOCUMENT WAS MARKED FOR  
 6 IDENTIFICATION AS EXHIBIT 1).  
 7 BY MR. LUNA:.  
 8 Q I'M HANDING YOU WHAT'S BEEN MARKED AS  
 9 EXHIBIT NUMBER ONE. IF YOU WOULD TAKE A LOOK AT THAT  
 10 EXHIBIT LET ME KNOW IF YOU RECOGNIZE IT.  
 11 A YES.  
 12 Q AND ON THE SECOND PAGE, THERE WERE DOCUMENTS  
 13 TO BE PRODUCED; AND I UNDERSTAND THAT YOU HAD  
 14 PREVIOUSLY PRODUCED DOCUMENTS THAT WERE RESPONSIVE TO  
 15 THIS. DID YOU FIND ANY OTHER DOCUMENTS THAT -- SINCE  
 16 THAT TIME THAT YOU THOUGHT MIGHT HAVE BEEN RESPONSIVE  
 17 TO THESE DOCUMENTS THAT YOU DIDN'T ALREADY PRODUCE TO  
 18 ME?  
 19 A ON THE THIRD PAGE?  
 20 Q ON THE -- YES, I'M SORRY, THE THIRD PAGE.  
 21 A OKAY. NO. I PRODUCED EVERYTHING THAT YOU  
 22 ASKED FOR THAT I HAD.  
 23 Q OKAY. THANK YOU. LET'S START WITH WHEN YOU  
 24 PURCHASED THIS PROPERTY.  
 25 A OKAY.

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1 Q ARE YOU MARRIED?  
 2 A YES.  
 3 Q WHAT IS YOUR HUSBAND'S NAME?  
 4 A JOSEPH ALTIER.  
 5 Q HOW LONG HAVE YOU BEEN MARRIED?  
 6 A ETERNITY. THIRTY-EIGHT YEARS.  
 7 Q OH, WOW. CONGRATULATIONS.  
 8 A THANKS.  
 9 Q YOU SAID THAT YOU MOVED TO THIS PROPERTY  
 10 APPROXIMATELY 1998. WOULD IT BE FAIR IF I TOLD YOU  
 11 AROUND 1996?  
 12 A COULD BE.  
 13 Q OKAY. LET'S DO THIS.  
 14 (THE REFERRED TO DOCUMENT WAS MARKED FOR  
 15 IDENTIFICATION AS EXHIBIT 2).  
 16 BY MR. LUNA:  
 17 Q I'M GOING TO --  
 18 A WE ORIGINALLY PURCHASED THE LOT. SO, THAT  
 19 COULD BE '96; BUT I'M THINKING WE WENT INTO THE HOUSE  
 20 IN '98, BUT I COULD BE WRONG.  
 21 Q OKAY. SO, LET'S START HERE. I'M HANDING  
 22 YOU WHAT'S BEEN MARKED AS EXHIBIT NUMBER TWO. LET ME  
 23 KNOW IF YOU RECOGNIZE THIS DOCUMENT.  
 24 A YES.  
 25 Q OKAY. DO YOU KNOW WHO DEBORAH INK IS?

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1 A THAT WAS THE DEVELOPER WHO OWNED THE LAND IN  
 2 PALMA VISTA.  
 3 Q OKAY. TELL ME WHERE PALMA VISTA IS.  
 4 A IT IS A SUBDIVISION IN METRO WEST OFF SOUTH  
 5 HIAWASSEE.  
 6 Q SO, WHEN YOU -- IT SAYS ON THE FIRST PAGE  
 7 THAT IT LOOKS LIKE IT WAS SOLD JUST TO YOU.  
 8 A YES.  
 9 Q IS THAT CORRECT?  
 10 A (RESPONDING IN THE AFFIRMATIVE). THIS IS  
 11 THE LOT.  
 12 Q SO, YOU BOUGHT THE LOT. HOW MUCH DID YOU  
 13 PAY FOR THE LOT?  
 14 A IF I REMEMBER RIGHT -- I DON'T REALLY  
 15 REMEMBER, BUT I THINK AROUND A HUNDRED THOUSAND.  
 16 Q IN 1996, WHAT DID YOU INTEND ON DOING WITH  
 17 THE LOT WHEN YOU PURCHASED IT?  
 18 A BUILD OUR HOME.  
 19 Q DID YOU DO THAT?  
 20 A YES.  
 21 Q DID SOMEBODY -- DID YOU HIRE SOMEBODY TO  
 22 CONTRACT TO BUILD YOUR HOME?  
 23 A JOE IS A GENERAL CONTRACTOR. WE BUILT IT  
 24 OURSELF.  
 25 Q SO YOU BUILT IT YOURSELF?

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1 A YES.

2 Q DID YOU SELF-FINANCE IT? WHO PAID FOR THE

3 CONSTRUCTION?

4 A WE HAD A CONSTRUCTION LOAN. I BELIEVE IT

5 WAS WITH SUNTRUST.

6 Q DO YOU REMEMBER HOW MUCH THAT WAS FOR?

7 A NO.

8 Q BALLPARK?

9 A THREE HUNDRED THOUSAND? I'M NOT SURE.

10 Q HOW BIG IS THE HOUSE?

11 A IT IS A FIVE-BEDROOM, ABOUT 4500 SQUARE

12 FEET.

13 Q OKAY. WHEN DID YOU MOVE INTO THE HOUSE?

14 A I THINK IN '98.

15 Q THE CONSTRUCTION LOAN THAT YOU HAD WITH

16 SUNTRUST, DID THAT CONVERT TO A PERMANENT LOAN?

17 A IT COULD HAVE. IT MIGHT HAVE. I DON'T

18 REMEMBER BACK THEN.

19 Q DO YOU REMEMBER MAKING MORTGAGE PAYMENTS TO

20 SOMEBODY?

21 A SUNTRUST.

22 Q SUNTRUST?

23 A (RESPONDING IN THE AFFIRMATIVE).

24 Q DO YOU REMEMBER WHEN YOU MOVED INTO THE

25 PROPERTY IF THERE WAS ANY NEW DOCUMENTATION SOMEBODY

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1 SAID THAT YOU HAD TO SIGN -- NEW LOAN DOCUMENTS?

2 A THERE MUST HAVE BEEN A CLOSING.

3 Q AND YOU HAVE LIVED THERE WITH YOUR FAMILY

4 SINCE 1998. IS THAT CORRECT?

5 A YES.

6 Q DO YOU OWN ANY OTHER HOUSES?

7 A YES.

8 Q WHAT OTHER HOUSES DO YOU OWN?

9 A NO, I DON'T OWN ANY OTHER HOUSES.

10 Q OKAY. ANY OTHER REAL PROPERTY?

11 A WHAT IS REAL PROPERTY?

12 Q LAND.

13 A OH, LAND. NO.

14 Q HAVE YOU EVER RENTED A PORTION OF YOUR HOUSE

15 TO ANYBODY ELSE?

16 A NO.

17 Q DID YOU EVER SELL YOUR HOUSE? WHEN I SAY

18 "HOUSE," I MEAN THE ROAT DRIVE PROPERTY.

19 A WELL, I DON'T KNOW IF SELL IS THE RIGHT

20 TERM, BUT IT WAS TURNED OVER TO OR EXCHANGED FOR THIS

21 TRUST COMPANY. TEXAS, I GUESS, TRUST, IT LOOKED LIKE

22 IN THIS DOCUMENT -- THESE DOCUMENTS.

23 Q DOES IT SOUND ACCURATE IF I SAID THE GRANDE

24 LEGACY GROUP? DOES THAT SOUND FAMILIAR?

25 A YES.

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1 Q WALK ME THROUGH THAT. HOW DID YOU AND WHY

2 DID YOU TRANSFER YOUR INTEREST IN THE PROPERTY TO

3 GRANDE LEGACY GROUP?

4 A ASSET PROTECTION.

5 Q DID YOU -- HOW DID YOU FIND GRANDE LEGACY

6 GROUP?

7 A I DON'T KNOW.

8 Q YOU DON'T KNOW? DID YOU TALK WITH A -- WAS

9 IT SOMEBODY CALLED TO TELL YOU ABOUT IT?

10 A I DON'T REALLY KNOW. I DIDN'T HANDLE ANY OF

11 THAT.

12 Q WHO HANDLED THAT?

13 A JOE.

14 Q OKAY.

15 (THE REFERRED TO DOCUMENT WAS MARKED FOR

16 IDENTIFICATION AS EXHIBIT 3).

17 BY MR. LUNA:

18 Q I'M HANDING YOU WHAT'S BEEN MARKED AS

19 EXHIBIT NUMBER THREE. TAKE A LOOK AT IT AND LET ME

20 KNOW WHEN YOU'VE HAD A CHANCE TO DO SO.

21 A OKAY.

22 Q IS THAT YOUR SIGNATURE ON THE BOTTOM LEFT?

23 A YES.

24 Q AND IT SAYS YOU AS TRUSTEE?

25 A (RESPONDING IN THE AFFIRMATIVE.)

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1 Q OKAY. WAS THAT A YES?

2 A YES.

3 Q THE FIRST LINE HERE SAYS: JODELL M. ALTIER

4 AND JOSEPH E. ALTIER, TRUSTEES OF ORANGE COUNTY,

5 FLORIDA. DO YOU KNOW WHY IT INCLUDES THE PHRASE

6 "TRUSTEES OF ORANGE COUNTY, FLORIDA"?

7 A NO.

8 Q DO YOU THINK JOE WOULD KNOW?

9 A I DON'T KNOW. I DON'T KNOW WHO PREPARED

10 THESE DOCUMENTS.

11 Q BUT YOU DIDN'T PREPARE THESE DOCUMENTS?

12 A I DIDN'T. NO.

13 Q OKAY. DO YOU -- SINCE YOU ACQUIRED THE LAND

14 ON EXHIBIT NUMBER TWO THAT WAS IN YOUR NAME, DID YOU

15 EVER SIGN ANY OTHER DEED OR CONVEYANCE OF ANY RIGHT TO

16 THIS -- THE 2507 ROAT DRIVE PROPERTY ADDRESS TO ANY

17 OTHER PARTY EXCEPT FOR WHAT IS DESCRIBED HERE IN

18 EXHIBIT THREE?

19 A I DON'T KNOW. IT'S BEEN A LOT OF YEARS.

20 Q DO YOU HAVE ANY REASON TO BELIEVE THAT YOU

21 DID?

22 A I MEAN, I DON'T REALLY KNOW. WE HAVE A LOT

23 OF BUSINESSES. WE HAD OTHER PROPERTIES; AND SO, I

24 DON'T REALLY KNOW. JOE HANDLED MOST OF THIS.

25 Q OKAY. BUT YOU WOULD AGREE WITH ME ON

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EXHIBIT TWO, THAT YOUR HUSBAND, JOSEPH ALTIER, WAS NOT AN OWNER OF THIS PROPERTY. IS THAT CORRECT?

A HE WASN'T AN OWNER OF THE LOT. CORRECT.

Q OKAY. HAVE YOU EVER SEEN ANY DOCUMENT OR A DEED THAT SHOWS THAT HE WAS THE OWNER OF THE LOT OR THE HOUSE?

A WELL, I DON'T SEE ANY PAPERWORK ON THE HOUSE. SO, I KNOW HE WAS WITH ME AT ALL CLOSINGS.

Q SO, LET'S TALK ABOUT THIS GRANDE LEGACY GROUP.

A OKAY.

Q WHEN YOU AND YOUR HUSBAND CONVEYED THE INTEREST IN THE 2507 ROAT DRIVE PROPERTY IN -- AND IT LOOKS LIKE IT WAS TRANSFERRED ON SEPTEMBER 17, 2013. DOES THAT LOOK ACCURATE TO YOU?

A OKAY. THIS WARRANTY DEED SAYS SEPTEMBER 18TH. SO, YEAH.

Q WERE YOU BEING SUED BY ANYBODY DURING THAT TIME?

A NO, I DON'T BELIEVE SO. THERE WAS SOME TALK ABOUT -- I WAS ON THE BOARD OF METRO WEST MASTER ASSOCIATION AND WE WERE TRYING TO REMOVE THE DEVELOPER AT THAT TIME; AND THERE WAS A BIG, I MEAN, LAWSUITS AND EVERYBODY TRYING TO GET HIM OUT. HE WAS A CONVICTED FELON AND ABSCONDING WITH THE MONIES AND ALL

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OF THAT. SO I WAS ELECTED ON THE BOARD. WE TRIED TO GET RID OF HIM. OUR COURSE OF ACTION DIDN'T WORK. SO THEY WERE COMING AFTER ME AS ON THE BOARD -- OR THERE WAS TALK OF THEM COMING AFTER ME FOR LEGAL FEES.

Q BUT NO LAWSUIT WAS EVER FILED AGAINST YOU RELATED TO THAT?

A NO. NO. IT WAS JUST THE POSSIBILITY.

Q DO YOU RECALL IF THE FORECLOSURE SUIT THAT WAS INITIATED BY THE BANK RELATED TO THIS PROPERTY HAD BEEN FILED AT THAT TIME OF THIS WARRANTY DEED IN EXHIBIT THREE?

A I DON'T BELIEVE SO.

Q WERE YOU CURRENTLY STILL MAKING PAYMENTS?

A WHAT WAS THE DATE?

Q SEPTEMBER 2013?

A NO.

Q YOU WERE NOT?

A NO.

Q HAD YOU RECEIVED ANY DEFAULT LETTERS?

A NO. I RECEIVED LETTERS STATING TO CALL THEM ABOUT -- WHAT DO YOU CALL IT? -- RENEGOTIATING. I DON'T KNOW WHAT THAT'S CALLED OFF THE TOP OF MY HEAD. THE AMOUNT DUE AND ALL THAT KIND OF STUFF, THAT'S THE ONLY THING I RECEIVED.

Q OKAY. DO YOU RECALL WHEN THE BANK ACTUALLY

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FILED THE FORECLOSURE PAPERWORK?

A I DON'T. I'M THINKING IT WAS 2014, BUT I DON'T KNOW THE DATE.

Q OKAY. SO, WHEN YOU SAID ASSET PROTECTION IS THE REASON WHY THE PROPERTY WAS TRANSFERRED TO GRANDE LEGACY GROUP, WHAT DO YOU UNDERSTAND THAT TO MEAN?

A THAT MEANS THAT IF THIS METRO WEST MASTER ASSOCIATION CAME AFTER ME, JODELL M. ALTIER, THAT THEY WOULDN'T BE ABLE TO TAKE MY HOME.

Q WOULD THE SAME THING BE TRUE ABOUT THE MORTGAGE COMPANY?

A I DON'T KNOW.

Q IF THE MORTGAGE COMPANY WERE TO COME AFTER YOU TO SUE YOU FOR NONPAYMENT OF THE MORTGAGE DEBT, WOULD THAT ALSO BE A REASON ABOUT WHY IT WAS TRANSFERRED TO THE --

A I DON'T THINK SO, BECAUSE WHEN YOU TRANSFER A WARRANTY DEED IT SAYS ALL ENCUMBRANCES AND ALL OF THAT GOES WITH THE PROPERTY TO WHOEVER YOU'RE GIVING IT TO.

Q OKAY. DID YOU CREATE GRANDE LEGACY GROUP?

A I DIDN'T. NO.

Q DO YOU KNOW WHO DID?

A NO.

Q OKAY. DO YOU HAVE ANY OFFICIAL RELATIONSHIP

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WITH GRANDE LEGACY GROUP?

A NO.

Q HAVE YOU EVER BEEN ASSOCIATED WITH GRANDE LEGACY GROUP?

A NOT THAT I KNOW OF.

Q DO YOU THINK THAT YOU ARE AN OWNER OR HOLD STOCK IN GRANDE LEGACY GROUP?

A THERE WAS AN EXCHANGE OF STOCK FOR THE PROPERTY. THAT'S ALL I KNOW. WE HAVE A STOCK CERTIFICATE.

Q DID YOU OR YOUR HUSBAND PERFORM ANY VALUATION OF THAT STOCK BEFORE RECEIVING IT?

A NO, I DIDN'T.

Q HAVE YOU EVER SEEN ANY FINANCIALS FOR GRANDE LEGACY GROUP TO DETERMINE WHAT THAT STOCK MIGHT BE WORTH?

A NO.

Q ASIDE FROM STOCK, DID YOU RECEIVE -- DID YOU OR YOUR HUSBAND RECEIVE ANYTHING OF VALUE IN EXCHANGE FOR THE DEED TO THE PROPERTY?

A NO.

Q OKAY. LET ME SHOW YOU --

(THE REFERRED TO DOCUMENT WAS MARKED FOR IDENTIFICATION AS EXHIBIT 4).

BY MR. LUNA:.

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1 Q I'M HANDING YOU WHAT'S BEEN MARKED AS  
 2 EXHIBIT NUMBER FOUR. TAKE A MOMENT TO TAKE A LOOK AT  
 3 IT AND LET ME KNOW WHEN YOU'VE HAD A CHANCE TO DO SO.  
 4 A OKAY.  
 5 Q IS THAT YOUR SIGNATURE ON THE SECOND PAGE  
 6 WHERE IT SAYS JODELL ALTIER, TRUSTEE FOR GRANDE LEGACY  
 7 GROUP?  
 8 A YES.  
 9 Q AND IS THAT YOUR SIGNATURE ON THE NEXT LINE  
 10 WHERE IT SAYS JODELL M. ALTIER, TRUSTEE FOR GRANDE  
 11 LEGACY GROUP-INDIVIDUALLY?  
 12 A YES.  
 13 Q DO YOU KNOW WHO CREATED THIS DOCUMENT?  
 14 A NO.  
 15 Q DO YOU KNOW WHAT THE PURPOSE OF THIS  
 16 DOCUMENT WAS?  
 17 A NO.  
 18 Q SO, TELL ME WHY YOU SIGNED THIS DOCUMENT?  
 19 A BECAUSE JOE SAID TO SIGN THE DOCUMENT.  
 20 Q DID HE TELL YOU WHY?  
 21 A NO.  
 22 (THE REFERRED TO DOCUMENT WAS MARKED FOR  
 23 IDENTIFICATION AS EXHIBIT 5).  
 24 BY MR. LUNA:  
 25 Q I'M HANDING YOU WHAT'S BEEN MARKED AS

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1 EXHIBIT NUMBER FIVE. TAKE A MOMENT TO TAKE A LOOK AT  
 2 THAT AND LET ME KNOW WHEN YOU'VE HAD A CHANCE TO DO  
 3 SO.  
 4 A OKAY.  
 5 Q DO YOU RECOGNIZE THIS DOCUMENT?  
 6 A YES.  
 7 Q WHAT IS THIS DOCUMENT?  
 8 A IT SAYS "TEXAS JOINT STOCK COMPANY OF GRANDE  
 9 LEGACY GROUP."  
 10 Q DID YOU CREATE THIS DOCUMENT?  
 11 A NO.  
 12 Q DO YOU KNOW WHO DID?  
 13 A NO.  
 14 Q ON PAGE -- AND IT'S HARD TO TELL, BUT ON THE  
 15 BOTTOM OF EACH PAGE IT APPEARS TO SAY "GRANDE LEGACY  
 16 GROUP" AND THEN A NUMBER DASH 15. IF YOU WOULD TURN  
 17 TO 6-15, IS THAT YOUR SIGNATURE ON THE MIDDLE OF THAT  
 18 PAGE AS JODELL M. ALTIER, EXCHANGER/CREATOR?  
 19 A YES.  
 20 Q DID YOU READ THIS DOCUMENT BEFORE SIGNING  
 21 IT?  
 22 A NO.  
 23 Q OKAY. DO YOU USUALLY READ DOCUMENTS BEFORE  
 24 SIGNING THEM?  
 25 A JOE HANDLED ALL THIS, SO...

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1 Q FAIR ENOUGH. DID JOE TELL YOU TO SIGN THIS?  
 2 A YES.  
 3 Q DID HE TELL YOU WHY?  
 4 A NO.  
 5 Q SAME THING WITH RESPECT TO GRANDE LEGACY  
 6 GROUP 8-15, WHERE IT'S TITLED "MINUTES OF GRANDE  
 7 LEGACY GROUP." IS THAT YOUR SIGNATURE ON THAT PAGE?  
 8 A YES.  
 9 Q DO YOU RECOGNIZE YOUR HUSBAND'S SIGNATURE?  
 10 A YES.  
 11 Q DOES THAT LOOK LIKE YOUR HUSBAND'S SIGNATURE  
 12 ON THAT SAME PAGE?  
 13 A YES.  
 14 Q IT SAYS HERE ON THE FIRST SENTENCE: "THE  
 15 CREATOR APPROACHED JOSEPH ALTIER AND JODELL ALTIER,  
 16 EXCHANGER, AND OFFERED TO TRADE TEN DOLLARS AND A  
 17 THOUSAND SHARES OF STOCK CONTAINED IN JOINT STOCK  
 18 COMPANY FOR REAL PERSONAL PROPERTY, A LIST BEING  
 19 ATTACHED HERETO COMPRISING THE SCHEDULE A AND B."  
 20 DOES THAT SOUND ACCURATE?  
 21 A YES.  
 22 Q DID YOU TRANSFER ANY PERSONAL PROPERTY TO  
 23 THE GRANDE LEGACY GROUP?  
 24 A NO.  
 25 Q JUST SO WE HAVE A --

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1 A I GUESS I DON'T KNOW THE DIFFERENCE BETWEEN  
 2 REAL PROPERTY AND PERSONAL PROPERTY.  
 3 Q I'LL CLARIFY. REAL PROPERTY IS GENERALLY  
 4 LAND WHERE YOU HAVE A HOUSE OR VACANT LAND. PERSONAL  
 5 PROPERTY ARE TANGIBLE THINGS LIKE A WATCH, CLOTHING,  
 6 CAR, THOSE TYPES -- STOCKS, BONDS. THOSE ARE  
 7 GENERALLY CONSIDERED PERSONAL PROPERTY.  
 8 A OKAY. NO PERSONAL PROPERTY THAT I KNOW OF.  
 9 Q OKAY. SO, THE SAME QUESTION I'M GOING TO  
 10 HAVE FOR YOU -- WE'LL GO AHEAD AND GET THIS OUT OF THE  
 11 WAY. ON PAGE 12, 13, 14, AND 15, ARE THOSE YOUR  
 12 SIGNATURES UNDER THE PLACES WHERE IT SAYS "JODELL M.  
 13 ALTIER"?  
 14 A YES.  
 15 Q DO YOU BELIEVE THAT WHERE IT SAYS "JOSEPH  
 16 ALTIER" ON THOSE PAGES THAT THAT'S YOUR HUSBAND'S  
 17 SIGNATURE?  
 18 A YES.  
 19 Q AND IT'S DATED SEPTEMBER 13, 2013. DO YOU  
 20 BELIEVE THAT THIS WAS EXECUTED THAT SAME DAY?  
 21 A I HAVE NO REASON TO BELIEVE IT WASN'T.  
 22 Q OKAY. DO YOU KNOW WHO DARRIN LAVINE IS? D  
 23 A R R I N, LAST NAME LAVINE, L A V I N E?  
 24 A YES, I HAVE MET HIM.  
 25 Q WHEN DID YOU FIRST MEET HIM?

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1 A I DON'T REMEMBER.  
 2 Q HOW LONG AGO?  
 3 A A COUPLE YEARS.  
 4 Q APPROXIMATELY 2013?  
 5 A A FEW YEARS. HE'S FRIENDS OF MY BROTHER AND  
 6 SISTER-IN-LAW. SO, I DON'T REALLY KNOW OFF THE TOP OF  
 7 MY HEAD WHEN.  
 8 Q DO YOU KNOW WHERE HE LIVES?  
 9 A NO, I DON'T.  
 10 Q DO YOU KNOW WHAT HE DOES FOR A LIVING?  
 11 A I BELIEVE HE OWNS A ROOFING COMPANY.  
 12 Q DOES HE DO WORK WITH YOUR HUSBAND?  
 13 A NO. THEY HADN'T. I THINK THEY'VE TALKED --  
 14 HAD TALKED AND GIVEN PROPOSALS TO EACH OTHER ON  
 15 PROJECTS. BUT I DON'T KNOW IF THEY'VE EVER WORKED  
 16 TOGETHER ON A PROJECT.  
 17 (THE REFERRED TO DOCUMENT WAS MARKED FOR  
 18 IDENTIFICATION AS EXHIBIT 6).  
 19 BY MR. LUNA:  
 20 Q I'M GOING TO HAND YOU WHAT'S BEEN MARKED AS  
 21 EXHIBIT NUMBER SIX. DO YOU RECOGNIZE THIS DOCUMENT?  
 22 A YES.  
 23 Q AND IS THAT YOUR SIGNATURE WHERE IT SAYS  
 24 "JODELL MARIE ALTIER"?  
 25 A YES.

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1 Q DO YOU BELIEVE THAT TO BE YOUR HUSBAND'S  
 2 SIGNATURE RIGHT ABOVE WHERE IT SAYS "JOSEPH EDWARD  
 3 ALTIER"?  
 4 A I DO.  
 5 Q AND YOU WOULD AGREE THAT IT SAYS IT'S DATED  
 6 SEPTEMBER 17, 2013?  
 7 A YES.  
 8 Q AND YOU ALSO SEE WHERE DARRIN LAVINE WAS  
 9 ACCEPTED AS A TRUSTEE?  
 10 A YES.  
 11 Q DO YOU KNOW WHY HE WAS PUT ON AS A TRUSTEE?  
 12 A I DON'T KNOW OFFHAND, OTHER THAN THAT WAS  
 13 SOMETHING HE AND JOE DISCUSSED. AND I KNOW THAT I  
 14 WASN'T REALLY INVOLVED IN THIS. AND I WAS HEADING IN  
 15 TO SURGERY OR BACK SURGERY SHORTLY THEREAFTER. AND I  
 16 KNOW THAT HE WAS GOING TO TAKE OVER ANY PURSUIT OF  
 17 THIS GRANDE LEGACY GROUP. HE WAS GOING TO BE IN  
 18 CHARGE OF IT TO TAKE THE BURDEN OFF.  
 19 Q OKAY. AND WHEN YOU SAY "BURDEN," WHAT DID  
 20 GRANDE LEGACY GROUP DO FOR YOU GUYS?  
 21 A I DON'T REALLY KNOW, OTHER THAN THE  
 22 PROPERTIES, YOU KNOW, BECAME THEIR RESPONSIBILITY OR  
 23 PUT IN THEIR NAME OR -- I DON'T REALLY KNOW.  
 24 Q DO YOU KNOW IF GRANDE LEGACY GROUP PAID FOR  
 25 ANY EXPENSES RELATED TO THE PROPERTY?

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1 A I DON'T KNOW.  
 2 Q HAVE YOU EVER SEEN ANY FINANCIALS OR  
 3 CORRESPONDENCE FROM ANYBODY AT GRANDE LEGACY GROUP?  
 4 A NO.  
 5 Q AND YOU DON'T KNOW WHO CREATED THIS EXHIBIT  
 6 NUMBER SIX?  
 7 A NO.  
 8 Q DO YOU THINK YOUR HUSBAND WOULD KNOW?  
 9 A HE COULD.  
 10 (THE REFERRED TO DOCUMENT WAS MARKED FOR  
 11 IDENTIFICATION AS EXHIBIT 7).  
 12 BY MR. LUNA:  
 13 Q I'M HANDING YOU WHAT'S BEEN MARKED AS  
 14 EXHIBIT NUMBER SEVEN. TAKE A MOMENT TO TAKE A LOOK AT  
 15 THAT AND LET ME KNOW WHEN YOU'VE HAD A CHANCE TO DO  
 16 SO.  
 17 A I HAVE.  
 18 Q OKAY. DO YOU -- IS THAT YOUR SIGNATURE AT  
 19 THE BOTTOM?  
 20 A YES.  
 21 Q IS THAT YOUR HUSBAND'S SIGNATURE RIGHT ABOVE  
 22 YOURS?  
 23 A LOOKS LIKE IT.  
 24 Q OKAY. AND IT'S DATED THE 13TH DAY OF  
 25 SEPTEMBER 2013?

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1 A YES.  
 2 Q DO YOU KNOW WHAT THIS DOCUMENT IS?  
 3 A IT'S THE DOCUMENT OF SHARES.  
 4 Q SHARES OF GRANDE LEGACY GROUP?  
 5 A YES.  
 6 Q AND ARE YOU THE ONLY OWNER OF GRANDE LEGACY  
 7 GROUP?  
 8 A I DON'T KNOW WHAT THAT MEANS.  
 9 Q OKAY. THE STOCK CERTIFICATE GENERALLY  
 10 DENOTES THAT THERE'S AN OWNERSHIP INTEREST IN GRANDE  
 11 LEGACY GROUP. DO YOU UNDERSTAND THAT CONCEPT?  
 12 A NO.  
 13 Q WHAT DID YOU THINK --  
 14 A WE EXCHANGED A THOUSAND SHARES OF STOCK FOR  
 15 THE REAL PROPERTY. THAT'S ALL I KNOW.  
 16 Q SO, THE THOUSAND SHARES OF STOCK, YOU WOULD  
 17 AGREE THAT YOU BELIEVED THAT YOU WERE BUYING AN  
 18 INTEREST IN GRANDE LEGACY GROUP?  
 19 A I DON'T KNOW.  
 20 Q WHAT DID YOU THINK THE THOUSAND SHARES  
 21 ACTUALLY MEANT?  
 22 A I DIDN'T REALLY KNOW.  
 23 Q OKAY. DO YOU HAVE ANY REASON TO BELIEVE  
 24 THAT YOU -- EITHER YOU OR YOUR HUSBAND -- OUTSIDE OF  
 25 YOU OR YOUR HUSBAND, SHOULD I SAY, IF THERE'S ANY

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1 OTHER OWNERS OF THIS COMPANY?  
 2 A I DON'T KNOW.  
 3 Q OKAY. BUT YOU DON'T HAVE ANY REASON TO  
 4 BELIEVE SO?  
 5 A I DON'T.  
 6 Q OKAY.  
 7 (THE REFERRED TO DOCUMENT WAS MARKED FOR  
 8 IDENTIFICATION AS EXHIBIT 8).  
 9 BY MR. LUNA:  
 10 Q I'M HANDING YOU WHAT'S BEEN MARKED AS  
 11 EXHIBIT NUMBER EIGHT. DO YOU RECOGNIZE THAT DOCUMENT?  
 12 A YES.  
 13 Q OKAY. WHAT IS IT?  
 14 A IT ARE THE SCHEDULES THAT WERE DUE WHEN I  
 15 FILED BANKRUPTCY.  
 16 Q OKAY. DID YOU PREPARE THESE SCHEDULES  
 17 YOURSELF?  
 18 A I DID.  
 19 Q DID YOU HAVE ANYBODY TO HELP YOU?  
 20 A NO.  
 21 Q DID YOU CONSULT WITH ANY ATTORNEY -- AND I  
 22 DON'T WANT TO KNOW WHAT YOU DISCUSSED, BUT DID YOU  
 23 CONSULT WITH ANY ATTORNEY BEFORE FILING THESE  
 24 SCHEDULES?  
 25 A NO.

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1 Q YOU WOULD AGREE WITH ME THAT ON YOUR  
 2 SCHEDULES THERE IS NOT -- THERE'S NO REFERENCE TO  
 3 GRANDE LEGACY GROUP STOCK ON HERE. IS THAT CORRECT?  
 4 A CORRECT.  
 5 Q OKAY. WHY DID YOU EXCLUDE THAT STOCK FROM  
 6 BEING LISTED ON YOUR SCHEDULES?  
 7 A BECAUSE I DIDN'T THINK IT HAD A VALUE.  
 8 Q BUT YOU WOULD AGREE THAT YOU'D HAVE SOME  
 9 OWNERSHIP INTEREST IN IT?  
 10 A I WOULD NOT AGREE TO ANYTHING ABOUT THAT. I  
 11 DON'T KNOW.  
 12 Q ON PAGE -- AT THE VERY TOP IT SAYS PAGE  
 13 WHATEVER OF 41. DO YOU SEE THAT?  
 14 A YES.  
 15 Q IF YOU'D TURN TO THE FIFTH PAGE. LINE 13  
 16 SAYS "STOCK AND INTEREST IN INCORPORATED AND  
 17 UNINCORPORATED BUSINESSES ITEMIZE." AND YOU HAVE  
 18 "NONE," CORRECT?  
 19 A (RESPONDING IN THE AFFIRMATIVE.)  
 20 Q WAS THAT A YES?  
 21 A YES.  
 22 Q AND SO, YOUR POSITION IS YOU DON'T THINK  
 23 THAT YOU SHOULD HAVE INCLUDED THE STOCK INTEREST IN  
 24 GRANDE LEGACY GROUP ON THIS SCHEDULE?  
 25 A I GUESS I COULD HAVE LISTED IT AS A

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1 DESCRIPTION WITH A ZERO VALUE. BUT IT WAS ZERO. SO I  
 2 DIDN'T EVEN WRITE IT DOWN.  
 3 Q OKAY. WHY DO YOU THINK IT HAS A ZERO VALUE?  
 4 A I DON'T KNOW THE VALUE.  
 5 Q SO, WHEN YOU SAY "ZERO," DO YOU REALLY MEAN  
 6 "UNKNOWN"?  
 7 A I MEAN ZERO. TO ME, IT'S WORTH THIS PAPER.  
 8 Q OKAY. FAIR ENOUGH. DO YOU STILL RESIDE AT  
 9 2507 ROAT DRIVE?  
 10 A YES.  
 11 Q WHAT IS YOUR INTENTION WITH THIS PROPERTY?  
 12 DO YOU INTEND TO CONTINUE LIVING THERE? OR DO YOU  
 13 PLAN ON MOVING?  
 14 A PLAN ON LIVING THERE.  
 15 Q OKAY. AND ARE YOU CURRENTLY PAYING ANY RENT  
 16 TO THE GRANDE LEGACY GROUP?  
 17 A NO.  
 18 Q ARE YOU PAYING ANY MORTGAGE PAYMENT?  
 19 A NO.  
 20 Q OKAY. ARE YOU AWARE THAT THERE'S  
 21 FORECLOSURE ACTION PENDING AGAINST YOURSELF, YOUR  
 22 HUSBAND, AS WELL AS THE GRANDE LEGACY GROUP?  
 23 A I KNOW ABOUT JOE AND I. I DON'T KNOW IF IT  
 24 INCLUDED THE GRANDE LEGACY GROUP.  
 25 Q DO YOU KNOW WHO JILL ALTIER IS?

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1 A JILL?  
 2 Q YES, MA'AM.  
 3 A MY DAUGHTER.  
 4 Q AND ARE YOU AWARE THAT SHE'S A -- IF SHE'S A  
 5 TRUSTEE OF THE GRANDE LEGACY GROUP?  
 6 A NO.  
 7 Q WOULD YOU BE SURPRISED IF I SHOWED YOU A  
 8 DOCUMENT SHOWING -- SAYING THAT SHE WAS?  
 9 A YES.  
 10 Q HOW OLD IS SHE?  
 11 A THIRTY-ONE.  
 12 Q OKAY. HAVE YOU RECEIVED ANY DISTRIBUTION OR  
 13 ANY TYPE OF COMPENSATION FROM GRANDE LEGACY GROUP?  
 14 A NOT THAT I KNOW OF.  
 15 Q HAVE YOU EVER SPOKEN WITH KELLY BOSECKER  
 16 BEFORE?  
 17 A YES.  
 18 Q WHAT DID YOU -- I DON'T WANT TO KNOW THE  
 19 SUBSTANCE, BUT WHAT WAS GENERALLY YOUR CONVERSATION  
 20 WITH HER?  
 21 A WHEN? I'VE KNOWN HER FOR A COUPLE YEARS.  
 22 Q SO, WHAT'S THE NATURE OF YOUR RELATIONSHIP  
 23 WITH HER?  
 24 A ATTORNEY. SHE'S AN ATTORNEY.  
 25 Q HAVE YOU RETAINED HER BEFORE?

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1 A YES.

2 Q FOR WHAT PURPOSE?

3 A THE FIRST TIME I RETAINED HER WAS FOR HELP

4 IN THE FORECLOSURE OF OUR BUILDING ON 35TH STREET IN

5 ORLANDO.

6 Q WHEN YOU SAY YOU, DO YOU MEAN --

7 A WELL, I MEAN ALTIER MECHANICAL. I WAS

8 MANAGER OF THAT COMPANY.

9 Q HAS SHE EVER REPRESENTED YOUR INDIVIDUAL

10 INTEREST?

11 A YES.

12 Q IN WHAT CONTEXT?

13 A IN -- WELL, I DON'T KNOW OFFHAND. I THINK

14 THAT SHE IS INVOLVED IN THE GAINESVILLE PROPERTY AND

15 ROAT PROPERTY. WHERE I LIVE.

16 Q TALK TO ME ABOUT THIS GAINESVILLE PROPERTY.

17 WHAT IS THIS GAINESVILLE PROPERTY?

18 A IT'S A SINGLE-FAMILY HOME IN GAINESVILLE.

19 Q WHO OWNS THAT PROPERTY?

20 A GRANDE LEGACY.

21 Q WHEN DID GRANDE LEGACY PURCHASE THAT

22 PROPERTY?

23 A I DON'T KNOW.

24 Q WHO OWNED THAT PROPERTY BEFORE GRANDE

25 LEGACY?

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1 A JOE AND I.

2 Q DO YOU REMEMBER WHEN IT WAS TRANSFERRED TO

3 GRANDE LEGACY?

4 A NO.

5 Q DOES THAT PROPERTY HAVE A MORTGAGE ON IT?

6 A I DON'T KNOW.

7 Q DO YOU REMEMBER WHEN YOU AND YOUR HUSBAND

8 PURCHASED THE PROPERTY IN GAINESVILLE?

9 A I'M GOING TO GUESS OFFHAND AROUND 2005.

10 Q WHAT WAS THE PURPOSE OF PURCHASING THAT

11 PROPERTY?

12 A MY GIRLS WENT TO THE UNIVERSITY OF FLORIDA;

13 AND WE BOUGHT IT FOR THEM TO LIVE IN. GO GATORS.

14 Q GO GATORS. AND WHAT IS THE ADDRESS OF THAT

15 HOUSE?

16 A 216 NORTHEAST 10TH AVENUE.

17 Q IS THAT CLOSE TO SANTA FE COMMUNITY COLLEGE?

18 A IT'S IN THE DUCK POND AREA. I DON'T KNOW.

19 IT'S A HISTORIC AREA.

20 Q I KNOW EXACTLY WHERE THE DUCK POND AREA IS.

21 DOES SOMEBODY CURRENTLY RESIDE AT THAT PROPERTY?

22 A YES.

23 Q OKAY. WHO CURRENTLY LIVES THERE?

24 A MY NEPHEW.

25 Q DOES HE GO TO SCHOOL THERE AS WELL?

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1 A YES.

2 Q DOES HE PAY RENT TO YOU GUYS?

3 A NO, HE DOESN'T.

4 Q HAVE YOU OR YOUR HUSBAND TRANSFERRED ANY

5 OTHER PROPERTY TO GRANDE LEGACY GROUP OTHER THAN THE

6 GAINESVILLE PROPERTY OR THE ROAT DRIVE PROPERTY?

7 A YES. WE HAVE TWO LAND PARCELS.

8 Q WHERE ARE THOSE LAND PARCELS?

9 A ONE IS AT SATELLITE BEACH AND ONE IS IN

10 PALMA VISTA.

11 Q WHAT ARE THE ADDRESSES OF THOSE PROPERTIES?

12 A NO CLUE.

13 Q LET'S TALK ABOUT THE SATELLITE BEACH

14 PROPERTY. WHEN DID YOU PURCHASE THE SATELLITE BEACH

15 PROPERTY?

16 A I DON'T KNOW. 2000 SOMETHING.

17 Q DO YOU KNOW HOW MUCH YOU PAID FOR IT?

18 A NO.

19 Q DO YOU REMEMBER HOW YOU PURCHASED IT?

20 MEANING, DID YOU TAKE OUT A LOAN OR DID YOU PAY CASH

21 FOR IT?

22 A I THINK WE PAID CASH FOR IT.

23 Q DO YOU KNOW IF THERE'S ANY MORTGAGE OR ANY

24 OTHER LIEN ON THAT PROPERTY?

25 A NO.

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1 Q WHERE IS THE OTHER LOT?

2 A IN PALMA VISTA.

3 Q PALMA VISTA. SAME NEIGHBORHOOD THAT YOU

4 LIVE IN?

5 A RIGHT.

6 Q WHAT IS ITS ADDRESS?

7 A I KNOW THE STREET. I DON'T KNOW STREET

8 NUMBER. IT'S ON KETTLE DRIVE -- K E T T L E.

9 Q WHEN DID YOU BUY THAT PROPERTY?

10 A I HAVE NO IDEA.

11 Q AND WHEN YOU TRANSFERRED THE PROPERTY -- THE

12 SATELLITE BEACH PROPERTY TO GRANDE LEGACY, DID THEY

13 GIVE YOU ANYTHING IN RETURN?

14 A I DON'T KNOW.

15 Q OKAY. DO YOU REMEMBER EXECUTING DOCUMENTS

16 SIMILAR TO THE EXHIBITS WE JUST WENT THROUGH RELATED

17 TO THOSE PROPERTIES AS WELL?

18 A I DON'T KNOW.

19 Q THE LOT THAT'S IN YOUR CURRENT NEIGHBORHOOD,

20 HOW DID YOU GUYS PAY FOR THAT LOT?

21 A THAT WAS CASH.

22 Q DO YOU HAVE ANY REASON TO BELIEVE THAT

23 THERE'S A MORTGAGE ON THAT PROPERTY?

24 A NO. NO MORTGAGE.

25 Q NO MORTGAGE? OKAY. WHAT'S YOUR INTENTION

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1 WITH RESPECT TO THAT PROPERTY?

2 A WHEN WE ORIGINALLY BUILT IT, WE WERE GOING  
3 TO BUILD A SINGLE-FAMILY HOME; AND THEN THE REAL  
4 ESTATE MARKET TOOK A HEADER AND IT REALLY HASN'T  
5 EVEN -- THE PROPERTY VALUES HAVEN'T COME BACK IN PALMA  
6 VISTA WHERE IT'S EVEN WORTH ANY PUTTING UP A HOUSE.  
7 IT WOULD COST TOO MUCH TO BUILD ACCORDING TO HOW YOU  
8 HAVE TO BUILD IN PALMA VISTA TO SELL.

9 Q DO YOU KNOW IF THERE -- ARE EITHER THE  
10 SATELLITE BEACH OR THE -- OR YOUR CURRENT  
11 NEIGHBORHOOD'S LOT, ARE THEY LISTED FOR SALE?

12 A NO.

13 Q DO YOU PLAN ON LISTING THEM?

14 A I DON'T -- THEY WERE AT ONE TIME, BUT I  
15 DON'T THINK THEY ARE NOW.

16 Q DO YOU PLAN ON LISTING THEM FOR SALE?

17 A NO. I MEAN, IF SOMEONE OFFERED ME  
18 SOMETHING, I DON'T KNOW.

19 Q FAIR ENOUGH. FAIR ENOUGH. OKAY. DO YOU  
20 KNOW WHO JENNIFER SANDMAN IS?

21 A MY DAUGHTER.

22 Q HOW OLD IS SHE?

23 A THIRTY-FOUR.

24 Q ARE YOU AWARE THAT SHE IS A TRUSTEE OF THE  
25 GRANDE LEGACY GROUP TRUST?

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1 A NO.

2 Q I CAN'T REMEMBER WHAT EXHIBIT THIS IS, BUT  
3 IT'S THIS DOCUMENT -- TEXAS JOINT STOCK COMPANY OF  
4 GRANDE LEGACY GROUP. ON PAGE --

5 A NUMBER FIVE?

6 Q -- ON PAGE 14 OF 15. DO YOU SEE HER NAME  
7 THERE?

8 A I DO.

9 Q DO YOU RECOGNIZE HER SIGNATURE?

10 A YES.

11 Q ARE YOU SURPRISED THAT SHE WOULD HAVE SIGNED  
12 THIS DOCUMENT?

13 A TO TELL YOU THE TRUTH, WHEN I SIGNED IT I  
14 THOUGHT IT WAS A WITNESS. SO, YEAH, I'M SURPRISED.

15 Q OKAY. ON THE NEXT PAGE, IS THAT YOUR  
16 DAUGHTER JILL?

17 A YES.

18 Q IT SAYS "SECOND SUCCESSOR TRUSTEE?"

19 A YES.

20 Q ARE YOU SURPRISED TO SEE HER SIGN THAT AS  
21 WELL?

22 A LIKE, AGAIN, I THOUGHT IT WAS A WITNESS. I  
23 GUESS I DIDN'T SEE THE TITLE.

24 Q OKAY. GOING BACK TO KELLY BOSECKER -- WHICH  
25 THE LAST NAME IS B O S E C K E R -- DO YOU KNOW IF YOU

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1 ARE -- YOU OR YOUR HUSBAND ARE CURRENTLY PAYING  
2 ANYTHING TO MS. BOSECKER FOR GRANDE LEGACY'S DEFENSE  
3 OF ANY PROCEEDING?

4 A I BELIEVE SO, BUT I DON'T KNOW FOR SURE.

5 Q WHO WOULD KNOW?

6 A JOE.

7 Q DO YOU HAVE AN ACCOUNTANT THAT PREPARES YOUR  
8 TAX RETURNS?

9 A YES.

10 Q WHO IS YOUR ACCOUNTANT?

11 A WELL, SOME OF THE TAX RETURNS THAT I GAVE  
12 YOU WAS THE CPA FIRM WARMUS -- LET'S SEE -- IT USED TO  
13 BE OSBURN HENNING. RON PERSONS IS OUR TAX ACCOUNTANT  
14 OR CPA. LAST YEAR IT WAS SOMEONE NEW. BECAUSE I  
15 COULDN'T AFFORD OSBURN HENNING.

16 Q DOES THE NAME RONNIE PITINO --

17 A YES. HE'S THE ONE WE USED LAST YEAR.

18 Q IS HE WITH THE SAME FIRM?

19 A NO.

20 Q HE'S TOTALLY DIFFERENT FIRM?

21 A HE'S INDEPENDENT. YEAH.

22 Q HE'S IN APOPKA?

23 A WHATEVER HE PUT THERE.

24 Q ASIDE FROM THE HOUSE THAT YOU LIVE IN, THE  
25 THE GAINESVILLE PROPERTY, AND THE TWO LOTS, HAVE YOU

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1 AND YOUR HUSBAND, OVER THE LAST FOUR YEARS,  
2 TRANSFERRED ANY PROPERTY?

3 A NO.

4 Q HAVE YOU TRANSFERRED ANYTHING ELSE TO THE  
5 GRANDE LEGACY GROUP?

6 A NO.

7 Q OKAY.

8 MR. LUNA: I THINK THAT'S ALL I HAVE. I  
9 APPRECIATE YOU FOR YOUR TIME. YOU HAVE THE RIGHT  
10 TO EITHER READ THE TRANSCRIPT OR WAIVE THAT  
11 RIGHT. WHEN YOU READ IT, YOU HAVE THE RIGHT TO  
12 NOT NECESSARILY CORRECT OR CHANGE YOUR TESTIMONY,  
13 BUT IF THERE'S SOME, YOU KNOW, MISPELLINGS AND  
14 WHATNOT, TO TAKE A LOOK AT THAT AND SIGN. IT'S  
15 CALLED AN ERRATA SHEET. WOULD YOU LIKE THE RIGHT  
16 TO READ IT OR WOULD YOU LIKE TO WAIVE THAT RIGHT?

17 THE WITNESS: I'D LIKE TO READ IT.

18 MR. LUNA: OKAY. ALL RIGHT. THANK YOU VERY  
19 MUCH. WE WILL ORDER.

20 THE WITNESS: OKAY. I'LL LEAVE THAT PILE  
21 FOR YOU.

22 MR. LUNA: THANK YOU VERY MUCH.

23 (WHEREUPON, THE PROCEEDINGS WERE CONCLUDED  
24 AT 9:50.)  
25

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## CERTIFICATE OF OATH

STATE OF FLORIDA)  
COUNTY OF ORANGE)

I, SANDRA A. MOSER, FLORIDA PROFESSIONAL  
REPORTER, NOTARY PUBLIC, STATE OF FLORIDA, HEREBY  
CERTIFY THAT JODELL M. ALTIER PERSONALLY APPEARED  
BEFORE ME AND WAS DULY SWORN ON THE 6TH DAY OF  
NOVEMBER 2015.

WITNESS MY HAND AND OFFICIAL SEAL THIS 6TH DAY OF  
NOVEMBER 2015.

## IDENTIFICATION:

PERSONALLY KNOWN \_\_\_\_\_

OR PRODUCED IDENTIFICATION \_\_\_\_\_

TYPE OF IDENTIFICATION PRODUCED \_\_\_\_\_

SANDRA A. MOSER, RPR, FPR  
NOTARY PUBLIC  
STATE OF FLORIDA AT LARGE  
MY COMMISSION NO. FF113959  
MY COMMISSION EXPIRES: 5/6/2018

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## SUBSCRIPTION OF DEPONENT

STATE OF FLORIDA  
COUNTY OF ORANGE

I, JODELL M. ALTIER, DO HEREBY CERTIFY,  
HAVING READ THE FOREGOING DEPOSITION, THAT SAID  
TRANSCRIPT IS A TRUE AND ACCURATE RECORDING OF  
THE PROCEEDINGS HAD AT THE TIME AND PLACE  
DESIGNATED, INCLUDING CORRECTIONS NOTED ON THE  
ERRATA SHEET, IF ANY.

JODELL M. ALTIER  
DATE: \_\_\_\_\_

SWORN TO AND SUBSCRIBED BEFORE ME THIS \_\_\_\_ DAY  
OF \_\_\_\_\_, \_\_\_\_.

NOTARY PUBLIC  
MY COMMISSION EXPIRES: \_\_\_\_\_

## ERRATA SHEET

I, JODELL M. ALTIER, WISH TO MAKE THE FOLLOWING  
CORRECTIONS:

PAGE LINE CORRECTION

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REALTIME REPORTERS, INC.  
1106 CHARMING STREET  
MAITLAND, FL 32751

407-884-4662

NOVEMBER 6, 2015

MRS. JODELL M. ALTIER  
2507 ROAT DRIVE  
ORLANDO, FL 32835

IN RE: JODELL M. ALTIER

CASE NO.: 6:15-BK-01838-KSJ  
DEPOSITION OF JODELL M. ALTIER

DEAR MRS. ALTIER:

YOUR DEPOSITION IS NOW READY FOR READING AND SIGNING.  
PLEASE CONTACT MY OFFICE TO MAKE ARRANGEMENTS TO DO  
SO. UNDER THE RULES OF COURT, YOU HAVE 30 DAYS TO  
COMPLETE SAME. SHOULD YOU FAIL TO READ AND SIGN YOUR  
TRANSCRIPT, IT MAY BE FILED WITHOUT YOUR SIGNATURE.

IF YOU HAVE ANY QUESTIONS, PLEASE DO NOT HESITATE TO  
CALL.

SINCERELY,

SANDRA A. MOSER,, RPR, FPR

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<b>COMING [2]</b> 14/3 14/4	<b>DESCRIBED [1]</b> 12/17	<b>EXCHANGER/CREATOR [1]</b> 18/18
<b>COMMISSION [3]</b> 37/20 37/20	<b>DESCRIPTION [1]</b> 27/1	<b>EXCLUDE [1]</b> 26/5
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10/21 15/11 15/13 18/8 19/18	<b>DID [47]</b>	7/15 7/22 11/16 11/19 12/14
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## **EXHIBIT “B”**

No. 1

**STOCK CERTIFICATE**  
**Shares**

**1000 Shares**

**(Bearer Shares)**

**OF**

**GRANDE LEGACY GROUP**

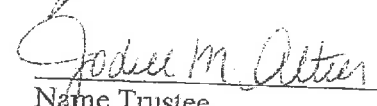
The Joint-Stock Company Indenture dated the 13 day of SEPTEMBER, 2013 creates GRANDE LEGACY GROUP, owner of the corpus thereof and managed through Trustee(s) designated in the Indenture Articles comprising of One-Thousand (1000) uniform shares in said Joint-Stock Company which are authorized for issue.

THEREFORE, the Trustee(s) do hereby certify that the holder of the Stock Certificate is the owner of One-Thousand (1000) shares. The Contingent Rights hereby conveyed consist solely of income as distributed by the action and sole discretion of the Trustee(s), and upon termination and liquidation, the distribution of the remaining assets of the said Joint-Stock Company. At the death or termination of the holder thereof, this certificate and the shares become null and void.

Said shares, as represented by this Certificate, are transferable in accordance with the Articles of the said Joint-Stock Company. This Certificate evidences the receipt of property whether personal or real, tangible or intangible, conveyed to said Joint-Stock Company under the conditions and for the purposes set forth in the said Joint-Stock Company Indenture which confers no rights, powers, privileges or interests not specifically declared in said Indenture.

IN WITNESS WHEREOF the Trustee has signed and sealed this Certificate as authorized by the said Joint-Stock Company Indenture, on this dated the 13 day of SEPTEMBER, 2013.

  
Name Trustee

  
Name Trustee

## **EXHIBIT “C”**

UNITED STATES BANKRUPTCY COURT  
MIDDLE DISTRICT OF FLORIDA  
ORLANDO DIVISION

CASE NO.: 6:15-bk-01838-KSJ

IN RE:

JODELL M. ALTIER,

Debtor.

---

FEBRUARY 1, 2016

HELD AT 400 WEST WASHINGTON STREET  
ORLANDO, FLORIDA

TRANSCRIPT ON MOTION FOR RELIEF FROM STAY

BEFORE THE HONORABLE KAREN S. JENNEMANN  
UNITED STATES BANKRUPTCY JUDGE

A P P E A R A N C E S:

JODELL M. ALTIER, PRO SE  
2507 Roat Drive  
Orlando, Florida  
Appearing as Pro Se Debtor

MICHAEL NARDELLA, ESQUIRE  
Nardella & Nardella, PLLC  
250 East Colonial Drive  
Ste. 102  
Orlando, Florida  
Appearing on behalf of the Chapter 7 Trustee  
Gene T. Chambers

LORNE DURKET, ESQUIRE  
541 E. Orange Street  
Altamonte Springs, Florida  
Appearing on behalf of Seterus, Inc.

Proceedings recorded by electronic sound recording  
Transcript provided by ACCREDITED COURT REPORTERS  
(407) 443-9289



I N D E X

PROCEEDINGS BEFORE JUDGE JENNEMANN: 3

Motion for Relief from Stay

CERTIFICATE OF REPORTER: 17

1                   ORLANDO, FLORIDA, FEBRUARY 1, 2016, 1:36 P.M.

2                   P R O C E E D I N G S

3                   THE CLERK: Please rise.

4                   United States Bankruptcy Court for the Middle  
5                   District of Florida is now in session. The Honorable  
6                   Karen S. Jennemann presiding. You may be seated.

7                   Court calls Case Number 15-1838, Jodell Altier.  
8                   Interested parties please step forward and enter your  
9                   appearance.

10                  MR. DURKET: Lorne Durket on behalf of Seterus  
11                  for Fannie Mae.

12                  MS. ALTIER: Jodell Altier, pro se.

13                  THE COURT: Very good.

14                  MR. NARDELLA: Good afternoon, Your Honor.  
15                  Michael Nardella here on behalf of the Trustee Gene  
16                  Chambers.

17                  THE COURT: And we are here today, Seterus seeks  
18                  relief from the automatic stay. There is a related  
19                  adversary proceeding that was filed by Goshen Mortgage,  
20                  which is not Seterus; is that correct?

21                  MR. DURKET: That's correct.

22                  THE COURT: Very good. And what is it that  
23                  you're seeking, Mr. Durket?

24                  MR. DURKET: Judge, this is property that's in  
25                  Gainesville. I just found out that this property is also

1 -- there's an appeal pending, too, in state court, so...

2 THE COURT: Of the foreclosure judgment?

3 MR. DURKET: Of the foreclosure judgment. So,  
4 at this time, I'm not sure what their intentions are,  
5 they said that they want to keep the property.

6 THE COURT: Who's they?

7 MR. DURKET: The debtors.

8 THE COURT: Okay.

9 MR. DURKET: They did not surrender it. They  
10 did not claim it as exempt. They want to keep it. So,  
11 I'm just letting -- I --

12 THE COURT: Okay.

13 MR. DURKET: So, as far as we're concerned,  
14 Judge, if the Trustee, unless the Trustee has an interest  
15 in this, I think we're entitled to relief.

16 THE COURT: What is the amount of debt on the  
17 property pursuant to the foreclosure judgment?

18 MR. DURKET: Okay. A hundred and seventy-five  
19 thousand.

20 THE COURT: Do you have any estimate, from your  
21 perspective, as to the value of the property?

22 MR. DURKET: According to the Alachua County  
23 records it's a hundred and twenty-one thousand.

24 THE COURT: Okay. And what kind of dwelling, if  
25 any, is around it? Is it a home?

1                   MR. DURKET: It would be a home, Judge. This  
2 judgment was entered on January of last year. So a  
3 hundred and seventy-five thousand plus interest which --

4                   THE COURT: A year.

5                   MR. DURKET: -- is probably going to be, you  
6 know, close to maybe another 15,000 I would say.

7                   THE COURT: Um-hum, um-hum.

8                   MR. DURKET: So you're close to 200,000.

9                   THE COURT: Okay. Very good. Let me ask, I'm  
10 going to get the Debtor's position last but, Mr.  
11 Nardella, what position, if any, do you take in this  
12 motion?

13                  MR. NARDELLA: Thank you, Your Honor.

14                  Your Honor, I don't know how much detail you  
15 want to know about this, but just very briefly, this is  
16 part of four different properties that were all  
17 transferred to an entity called the Grande Legacy Group  
18 all on September 17th, 2013. We, as the Trustee, just  
19 filed an adversary.

20                  THE COURT: So a separate one from the Goshen  
21 one, you just had filed it?

22                  MR. NARDELLA: Um-hum.

23                  THE COURT: Okay.

24                  MR. NARDELLA: Yes, ma'am. As to, mostly to  
25 declare the Trustee's interest and in the alternative

1 fraudulent transfers. Your Honor, we did not actually  
2 include this one in the lawsuit because it does not  
3 appear to be any equity in it. It sold in 2013 for  
4 207,000. So it's cutting it pretty close. However, Your  
5 Honor, actually in preparing for today's hearing I  
6 learned that there was -- when I saw there was an appeal  
7 that was filed by the Debtor --

8 THE COURT: Um-hum.

9 MR. NARDELLA: -- in June after the bankruptcy  
10 was filed --

11 THE COURT: Um-hum.

12 MR. NARDELLA: -- and that the parties have been  
13 exchanging briefs, which is strange to me because I would  
14 imagine the Debtor has not (sic) standing --

15 THE COURT: Um-hum.

16 MR. NARDELLA: And, you know, just, this is all  
17 very, you know, I'm sorry that I'm just getting to  
18 learning this this morning in preparation for this but I  
19 went and reviewed the foreclosure docket and saw that.  
20 So, Your Honor, I don't know if they need nunc pro tunc  
21 relief or if the appeal was just void because --

22 THE COURT: Well, the judgment was entered in  
23 '13 you say, correct?

24 MR. DURKET: It was entered in '15.

25 THE COURT: '15.

1 MR. DURKET: January 12th of 2015.

2 THE COURT: January, '15, the 12th.

3 MR. NARDELLA: Right, and the case was --

4 MR. DURKET: So it's a year.

5 THE COURT: So it's been a pre-petition then.

6 MR. NARDELLA: Yes.

7 MR. DURKET: Pardon?

8 THE COURT: Yeah, the judgment, your judgment is  
9 pre-petition.

10 MR. DURKET: That is correct.

11 MR. NARDELLA: And the bankruptcy was in March I  
12 believe and the appeal was filed by the Debtor in June.  
13 The creditor just filed its reply brief a couple of weeks  
14 ago I saw on the docket, the First DCA docket.

15 MR. DURKET: Don't know, Judge.

16 THE COURT: Okay, anyway, and, Ms. Altier?

17 MS. ALTIER: I just wanted to bring the  
18 attention to the Court the pending appellate action  
19 which, among other things, challenges the creditor's  
20 right to sell. The case number for the appeal is 1D15-  
21 3000 and it is appealing the judgment obtained in the  
22 foreclosure case, which is Number 2014 Charlie Adam 2751.

23 THE COURT: Tell me why you think you can  
24 proceed with that appeal?

25 MS. ALTIER: Because we have been ongoing with

1       this appeal for years.

2               THE COURT: Well, the appeal was filed in June  
3       of 2015.

4               MS. ALTIER: We -- we've been in court with this  
5       case. We -- before Seterus came --

6               THE COURT: Yeah.

7               MS. ALTIER: -- the judge even awarded the  
8       property to us --

9               THE COURT: Yeah.

10              MS. ALTIER: -- but after the fact, then Fannie  
11       Mae came in and said, well, let us interject in this.

12              THE COURT: Um-hum.

13              MS. ALTIER: So the court case started all over  
14       again.

15              THE COURT: Um-hum.

16              MS. ALTIER: But this has been going on for a  
17       long time in appeal court.

18              THE COURT: But you picked a Chapter 7  
19       bankruptcy.

20              MS. ALTIER: That's true but my name, when I  
21       filed bankruptcy, I did it in the name of Jodell Altier.

22              THE COURT: Yeah.

23              MS. ALTIER: I don't -- we object to the  
24       creditor's standing on both my home that I live in and  
25       the Gainesville house.

1 THE COURT: Um-hum.

2 MS. ALTIER: We see they have no standing after  
3 I did a forensic audit of the title search. All that's  
4 being hashed out in state court. They have all the  
5 documents. The judge are -- the judges are reviewing all  
6 of that.

7 THE COURT: Yeah, but you claim an interest in  
8 this property in Gainesville, right?

9 MS. ALTIER: Well, Grande Legacy Group --

10 THE COURT: Um-hum.

11 MS. ALTIER: -- which is the trustee --

12 THE COURT: Um-hum.

13 MS. ALTIER: -- or is a stock trust company that  
14 I'm one-fifth --

15 THE COURT: Um-hum, um-hum. But --

16 MS. ALTIER: -- verified trustee.

17 THE COURT: But before June of 2000 -- September  
18 17th of 2013 the title was in your name, right?

19 MS. ALTIER: Well, it wasn't supposed to be.

20 THE COURT: Um-hum.

21 MS. ALTIER: This is what they're -- I hired an  
22 attorney in 2011, somewhere around there --

23 THE COURT: Um-hum.

24 MS. ALTIER: -- that moved our properties that  
25 we had, two land properties --



1 THE COURT: Um-hum.

2 MS. ALTIER: -- and our two homes were supposed  
3 to go into the Altier Family Irrevocable Trust.

4 THE COURT: Um-hum.

5 MS. ALTIER: For some reason two of the  
6 properties got moved, two did not.

7 THE COURT: Um-hum.

8 MS. ALTIER: So my contention is still with that  
9 attorney.

10 THE COURT: Um-hum.

11 MS. ALTIER: We were unaware of that until just  
12 recently it was brought to our attention --

13 THE COURT: Um-hum, um-hum.

14 MS. ALTIER: -- with the title to Grande Legacy.

15 THE COURT: And the reason that there was some  
16 comment about your ability to bring the appeal is that  
17 once you file bankruptcy, unless it's exempted property  
18 which this isn't, you don't have any interest anymore.  
19 You can't pick it both ways. You can't pursue ownership  
20 claims and at the same time pursue bankruptcy. You make  
21 a choice.

22 MS. ALTIER: Uh-huh.

23 THE COURT: And in --

24 MS. ALTIER: Well, I didn't think it was in my  
25 name. I didn't think it was mine.

1 THE COURT: Um-hum.

2 MS. ALTIER: I have stock.

3 THE COURT: Well, then you have --

4 MS. ALTIER: I don't have property.

5 THE COURT: Okay.

6 MS. ALTIER: So I can't have it both ways.

7 THE COURT: So you don't oppose this motion?

8 MS. ALTIER: I do oppose the motion.

9 THE COURT: Why then?

10 MS. ALTIER: Because, well, we filed our initial  
11 brief and the creditor is aware of the appeal, which is  
12 Seterus --

13 THE COURT: Yeah.

14 MS. ALTIER: -- they however have filed a motion  
15 for an extension of time to file an answer brief, which I  
16 believe is a deliberate ploy to prevent us from, or  
17 myself, from my right to due process in the appellate  
18 action; and until the appellate action has been fully  
19 adjudicated, I argue that the creditor has no right to  
20 sell the property and the motion to lift the bankruptcy  
21 -- the bankruptcy should be denied.

22 THE COURT: Well, they can't reset the sale  
23 until the appeal is resolved regardless of whether it's  
24 valid or not. So what I don't understand is why you  
25 don't want the appeal to go forward.

1 MS. ALTIER: I do want the appeal to go forward  
2 but I understood that they're trying to get the sale  
3 through bankruptcy and not go through the appellate  
4 court, and I -- I'm pro se, I'm just trying to read all  
5 this --

6 THE COURT: Yeah.

7 MS. ALTIER: -- I can't find an attorney at this  
8 point.

9 THE COURT: And it may be that the Trustee has  
10 an interest, that's a whole different issue.

11 Do you take a position on this motion?

12 MR. NARDELLA: Your Honor, we don't believe  
13 there is any equity, so we don't take a position on the  
14 motion.

15 THE COURT: Okay.

16 MR. NARDELLA: But for purposes of regularity  
17 with the Court, the Debtor doesn't have standing, there  
18 may need to be some sort of order entered to bless  
19 whatever's been going on.

20 THE COURT: Yeah, yeah.

21 MR. NARDELLA: Otherwise, it could be a lot of  
22 wasted time and energy.

23 THE COURT: Yeah.

24 MR. DURKET: And, Judge, I don't think the  
25 Trustee is hurt by us by granting our motion --

1 THE COURT: I don't either.

2 MR. DURKET: -- regardless, if we get relief in  
3 the -- appellate relief, they still would have plenty of  
4 time to go forward and see if they get -- well, they can  
5 check to see if there's equity in it now.

6 THE COURT: Um-hum.

7 MR. DURKET: They can still do their due  
8 diligence. They have plenty of time.

9 THE COURT: Um-hum. See, the appellate court's  
10 not going to do anything right now because of the pending  
11 bankruptcy. Now, I assume one of you have let the  
12 appellate know of the pending bankruptcy.

13 MR. NARDELLA: I'm not sure they know, Your  
14 Honor. There was a suggestion of bankruptcy filed on the  
15 docket of the underlying foreclosure.

16 THE COURT: Yeah.

17 MR. NARDELLA: But I didn't see anything on the  
18 appeal. I have a copy of the appellate docket I printed  
19 off this morning --

20 THE COURT: Um-hum.

21 MR. NARDELLA: -- to show to the parties and  
22 Your Honor.

23 THE COURT: That's all right. I mean, I'm not  
24 going to -- this is not an evidentiary hearing today.  
25 I'm just trying to decide if there's any reason that I

1       need to have an evidentiary hearing on just whether the  
2       stay should lift and I guess I haven't heard one yet  
3       but --

4               MR. DURKET: Judge, if we're going to go forward  
5       with an appeal, I think we're going to need the stay  
6       lifted.

7               THE COURT: Oh, I do, too. I mean, if you  
8       don't, the only thing that happens is whatever they do is  
9       void from the minute they do it so...

10              MS. ALTIER: Then I have no objection over the  
11       stay because --

12              THE COURT: Yeah.

13              MS. ALTIER: -- I want the appellate court to  
14       rule on this.

15              THE COURT: Yeah, I think that's --

16              MS. ALTIER: They've got all the evidence.

17              THE COURT: Yeah. I will grant the motion. If  
18       you will submit the order, Mr. Durket.

19              MR. DURKET: Very good. Thank you, Your Honor.

20              THE COURT: Thank you.

21              MR. DURKET: I can put some language in there  
22       that if we've done anything in the appellate court, that  
23       that's -- that the Court does not find that's a violation  
24       of the stay? I mean, I don't know that they have but  
25       it's -- what I'm hearing right now, they may have even

1 just filed a motion to extend the time but that's still  
2 -- it's not a violation of the stay, I don't think, but I  
3 want to make sure it's clean.

4 THE COURT: Just -- and I don't know if you --  
5 well, you filed the appeal, too, so I think that's  
6 probably good for both of you just to say the appeal can  
7 track on --

8 MR. NARDELLA: Perhaps the language --

9 THE COURT: -- and that there's been no  
10 violation. Hum?

11 MR. NARDELLA: Perhaps the language would be  
12 nunc pro tunc --

13 THE COURT: Yeah.

14 MR. NARDELLA: -- as of the Petition date.

15 THE COURT: Yeah. Yeah, run it by everybody if  
16 you don't mind, Ms. Altier as well as Mr. Nardella --

17 MR. DURKET: Okay.

18 THE COURT: -- just so that there's no question  
19 but I think, you know, whatever has happened in the  
20 appeal needs to proceed on.

21 MR. DURKET: Yeah.

22 THE COURT: And I will grant the motion.

23 MR. DURKET: Okay. Very good. Thank you, Your  
24 Honor.

25 THE COURT: Thank you.

1 MR. NARDELLA: Thank you, Your Honor.

2 THE COURT: Thanks.

3 (Thereupon, the taking of the proceedings was  
4 concluded.)

5

6

7

C E R T I F I C A T E

\_\_\_\_\_I Certify that the foregoing is a correct transcript from the electronic sound recording of the proceedings in the above-styled matter.

*Lois H. Simonds*

March 4, 2016

LOIS H. SIMONDS

Notary Public-State of Florida

Commission Expires: 12/18/18

Commission #FF175996

FEDERALLY CERTIFIED TRANSCRIPT AUTHENTICATED BY:

/s/Antonio F. Hamilton

Accredited Court Reporters



## **EXHIBIT “D”**

IN THE CIRCUIT COURT OF THE NINTH JUDICIAL CIRCUIT  
IN AND FOR ORANGE COUNTY, FLORIDA  
CIVIL DIVISION

CASE NO.: 2013-CA-12147

CHRISTIANA TRUST, A DIVISION  
OF WILMINGTON SAVINGS FUND  
SOCIETY, FSB, AS TRUSTEE FOR  
STANWICH MORTGAGE LOAN  
TRUST, SERIES 2012-13,

Plaintiff,

v.

JODELL M. ALTIER, et al.,

Defendants.

---

**AMENDED MOTION TO INTERVENE/MOTION TO ADD INDISPENSABLE PARTY  
DEFENDANT**

Intervenor, GRANDE LEGACY GROUP, DARRIN C. LAVINE, as Trustee, by  
and through the undersigned counsel, pursuant to Florida Rules of Civil Procedure 1.230,  
hereby files this Amended Motion to Intervene/Motion to Add Indispensable Party  
Defendant in this action between Plaintiff, CHRISTIANA TRUST, A DIVISION, OF  
WILMINGTON SAVINGS FUND SOCIETY, FSB, AS TRUSTEE FOR STANWICH  
MORTGAGE LOAN TRUST, SERIES 2012-13, (referred to as Plaintiff) and Defendants  
JOSEPH ALTIER and JODELL M. ALTIER, (referred to as DEFENDANTS), and states as  
follows:

1. Intervenor bought the subject property on September 17, 2013.
2. Plaintiff filed a Complaint for Foreclosure on October 4, 2013.

3. Intervenor, Grande Legacy Group, Darrin C. Lavine, as Trustee was not served with the Complaint although Grande Legacy Group was the owner of the property at time the foreclosure suit was filed.

4. Intervenor, Grande Legacy Group, Darrin C. Lavine, as Trustee, has the requisite interest in the litigation to permit its intervention because the issues it seeks to raise are encompassed by the present controversy between the parties to this case.

See Union Cent. Life Ins. Co. v. Carlisle, 593 So.2d 505, 507 (Fla. 1992) (Intervention should be permitted where the parties' interests are "of such a direct and immediate character that the intervenor will either gain or lose by the direct legal operation and effect of the judgment.") Here, Grande Legacy Group, Darrin C. Lavine, as Trustee, is the record owner of the property. Consequently, Intervenor Grande Legacy Group, Darrin C. Lavine, as Trustee, is an appropriate party to this litigation.

5. Leave to intervene shall be given freely when justice so requires and is greatly favored in Florida. See Florida Rules of Civil Procedure 1.230; National Wildlife Fed'n Inc. v. J.T. Glisson, 531 So.2d 996,997 (Fla. 1st DCA 1988) ("Intervention should be liberally allowed."); see also Miracle House Corp. v. Haige, 96 So.2d 417, 418 (Fla. 1957).

6. More than a century ago, the Florida Supreme Court recognized that “a **foreclosure** proceeding resulting in a final decree and a sale of the mortgaged property, without the holder of the legal **title** being before the court will have no effect to transfer his **title** to the purchaser at said sale.” *Jordan v. Sayre*, 24 Fla. 1, 3 So. 329, 330 (1888). If the **foreclosure** proceeding has no **effect to transfer title** because the legal **title** holder has not been joined, it is simply another way of saying that the **foreclosure** proceeding is void.

In *English v. Bankers Trust Company of California*, 895 So.2d 1120 (Fla. 4<sup>th</sup> DCA 2005), the Court held, “Because Lesa Investments, the undisputed owner, was not a party to the first suit, the initial foreclosure judgment could not result in a valid sale, as the owner of the fee simple title was an indispensable party. *Community Fed. Svcs. and Loan Ass'n v. Wright*, [452 So.2d 638, 640 \(Fla. 4th DCA 1984\)](#). The Court further reasoned, We note that, more than a century ago, the Florida Supreme Court recognized that “a foreclosure proceeding resulting in a final decree and a sale of the mortgaged property, without the holder of the legal title being before the court will have no effect to transfer his title to the purchaser at said sale.” *Jordan v. Sayre*, [24 Fla. 1, 3 So. 329, 330 \(1888\)](#).

If the foreclosure proceeding has no effect to transfer title because the legal title holder has not been joined, it is simply another way of saying that the foreclosure proceeding is void.

7. The granting of this Motion to Intervene will not unduly delay this action or prejudice any of the parties because the action of Foreclosure of the Intervenor's property without due process has already inextricably linked the Intervenor to this action.

#### **MOTION TO JOIN INDISPENSABLE PARTY DEFENDANT**

8. The Defendants and Darrin C. Lavine, as Trustee move this Court to join Grande Legacy Group, Darrin C. Lavine, Trustee as an indispensable Party Defendant as he has an interest in the subject Property through a Quit Claim Deed filed in the Public Records of Orange County, Florida, 2507 Roat Drive, Orlando, FL 32835, O.R. Book 10636, Page 3463 on September 18, 2013. (See attached Quit Claim Deed).

9. The owner of the fee simple title is the only indispensable party Defendant to a foreclosure action. See *English v. Bankers Trust Company of California, N.A.*, 895 So.2d 1120 (4<sup>th</sup> DCA 2005).

10. More than a century ago, the Florida Supreme Court recognized that “a foreclosure proceeding resulting in a final decree and a sale of the mortgaged property, without the holder of legal title being before the court will have no effect to transfer his title to the purchaser at said sale.” *Jordan v. Sayre*, 24 Fla. 1, 3 So. 329, 330 (1888). If the foreclosure proceeding has no effect to transfer title because the legal title holder has not been joined, it is simply another way of saying that the foreclosure proceeding is void.

11. As the title owner of the property prior to the filing of the Lis Pendens, Grande Legacy Group, Darrin C. Lavine, Trustee is an indispensable party in this action.

12. An indispensable party is a necessary party to essential to a suit that no final decision can be rendered without their joinder. *Sudhoff v. Federal National Mortgage Association*, 940 So.2d 425 (Fla 5th DCA 2006) .

13. Failure to allow Darrin C. Lavine to join the instant action as holder of legal title and an indispensable party in this matter would render any judgment entered void.

WHEREFORE, Defendants, Joseph and Jodell Altier and Intervenor, Grande Legacy Group, Darrin C. Lavine, as Trustee, respectfully request this Court: (a) grant this Amended Motion to Intervene/ Motion to Add Indispensable Party Defendant; (b) direct the Clerk to amend the style in this case to reflect the new Defendant, Grande Legacy Group, Darrin C. Lavine, as Trustee ; and (c) for such other and further relief as the Court deems just and proper.

Respectfully Submitted,

/s/ Kelley A. Bosecker \_\_\_\_\_  
Kelley A. Bosecker  
Attorney at Law  
1400 Gandy Boulevard, #706  
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813-334-1745  
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Florida Bar No. 0443931  
Attorney for Grand Legacy Group,

Darrin Lavine Trustee  
[sbosecker@tampabay.rr.com](mailto:sbosecker@tampabay.rr.com)  
[kbosecker@tmo.blackberry.net](mailto:kbosecker@tmo.blackberry.net)

/s/ Joseph Altier  
Joseph Altier  
Pro se  
2507 Roat Drive  
Orlando, FL 32835

/s/ Jodell Altier  
Jodell Altier  
Pro se  
2507 Roat Drive  
Orlando, FL 32835

**CERTIFICATE OF SERVICE**

**WE HEREBY CERTIFY** that a true and correct copy of the foregoing was served by E-Mail upon the following party: Alberto T. Montequin, Esq., Lender Legal Services, Attorney for Plaintiff, 201 E. Pine Street, Suite 730, Orlando, Florida, [AMontequin@LenderLegal.com](mailto:AMontequin@LenderLegal.com), this 6th day of November 2015.

/s/ Kelley A. Bosecker \_\_\_\_\_  
Kelley A. Bosecker  
Attorney at Law

Prepared by:

After Recorded return to  
Jodell M. & Joseph E Altier  
2507 Roat Dr  
Orlando, FL 32835

DOC# 20130497796 B: 10636 P: 3463  
09/18/2013 03:13:41 PM Page 1 of 2  
Rec Fee: \$18.50  
Deed Doc Tax: \$0.70  
DOR Admin Fee: \$0.00  
Intangible Tax: \$0.00  
Mortgage Stamp: \$0.00  
Martha O. Haynie, Comptroller  
Orange County, FL  
SA - Ret To: JOSEPH ALTIER

## Warranty Deed

STATE OF FLORIDA            )  
  )  
COUNTY OF ORANGE        )

KNOW ALL MEN BY THESE PRESENTS, that Jodell M. Altier & Joseph E. Altier, Trustees of Orange County Florida, grant and convey for Ten Dollars and other valuable considerations unto the said Grande Legacy Group (A Texas Joint-Stock Company) of Orange County, Florida all that certain residential lot and improvements known as:

2507 Roat Dr Orlando, FL 32835

That property located and more specifically described as that property;

Real property in the County of Orange, State of Florida –

Legal Description:

LOT 26A, PALMA VISTA REPLAT, ACCORDING TO THE PLAT OR MAP THEREOF AS RECORDED IN PLAT BOOK 29, PAGE 45, OF THE PUBLIC RECORDS OF ORANGE COUNTY, FLORIDA.

PARCEL ID: 23-28-03-6577-00-260

To have and to hold the above described premises, together with all and singular, the rights and appurtenances thereto in any wise belonging unto the said Grande Legacy Group its heirs or assigns forever, and we do hereby bind ourselves, our heirs, executors and administrators to warrant and forever defend all and singular the said premises unto the said Grande Legacy Group its heirs and assigns, against every person whomsoever lawfully claiming or to claim the same, or any part thereof. This Deed is subject to any liens and mortgages authorized and executed by the Grantors.

by Jodell M. Altier  
Jodell M. Altier, Trustee

Joseph E. Altier  
Joseph E. Altier, Trustee

L. Beck  
Witness

KATHERINE BECK  
Print.

Michele Dobrucky  
Witness

Michele Dobrucky  
Print

STATE OF FLORIDA

)(

COUNTY OF ORANGE

)(

)(

On the 17 day of Sept, 2013, before me came, Jodell M. Altier & Joseph E. Altier Trustees, known to me to be the individuals described in, and who executed the foregoing instrument, and he/her acknowledged that he/her executed the same, and in due form of law acknowledged the foregoing instrument to be his/her free act and deed and desired the same might be recorded as such.

Witness my hand and official seal.

Javier Solis

Printed Name

Javier Solis

Notary Public in and for the State of Florida

My Commission Expires: 03/15/14

